

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

PHARMA FUNDING, LLC.

Civil Action No. 3:20-CV-01731-N

*Plaintiff,*

-against-

VERDE PHARMACY & MEDICAL SUPPLY, LLC.  
and OSARU OKORO

*Defendants.*

---

**MOTION TO WITHDRAW AS COUNSEL OF RECORD FOR  
DEFENDANTS VERDE PHARMACY LLC AND OSARU OKORO**

COMES NOW, Shayan Elahi, Esq. of the Elahi Law Firm, PLLC. (hereinafter “Counsel”) files this Motion to Withdraw as Counsel of Record (herein after “the Motion”) for Defendants: VERDE PHARMACY & MEDICAL SUPPLY, LLC. (“Verde Pharmacy”) and OSARU OKORO in the above styled matter and as grounds would show the following:

1. Due to various irreconcilable differences and potential conflict regarding legal strategy between Defendant and his Counsel, Defendant can no longer be represented by Counsel and his law firm.
2. Despite the best attempts by all parties, they have been unable to resolve these differences in opinions as to the appropriate legal strategy.
3. Regretfully, the undersigned counsel has no alternative to filing this motion.  
Accordingly, Counsel moves to withdraw.
4. Counsel has sought authorization of the clients but has not gotten a response as of the filing of this Motion.
5. There are no court dates set in this matter and no scheduling order currently pending.

**CERTIFICATE OF CONFERENCE**

I certify that on September 20, 2021, I emailed the opposing counsels for their position on this motion and they have not responded to this motion to withdraw, as of time of its filing.



---

Shayan Elahi, Esquire

WHEREFORE, PREMISIS CONSIDERED Counsel asks this Court to discharge Shayan Elahi, Esq. as counsel of record for both defendants.

Respectfully submitted,

**ELAHI LAW FIRM PLLC**



---

Shayan Elahi, Esquire  
State Bar No. 24080485  
8111 LBJ Fwy. Ste 655  
Dallas, Texas 75251  
Telephone No: (972)-675-7615  
[shayan@elahilawfirm.com](mailto:shayan@elahilawfirm.com)  
**ATTORNEY FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I certify that on September 20, 2021 a true and correct copy of the foregoing was served upon all parties of record by e-service.

A handwritten signature in blue ink, appearing to read "Shayan Elahi", is positioned above a horizontal line.

---

Shayan Elahi, Esquire